

KRIEGER LEWIN LLP

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350 Fifth Avenue, 77<sup>th</sup> Floor  
New York, NY 10118  
Telephone: (212) 390-9550  
www.KriegerLewin.com

Nicholas J. Lewin  
  
Direct Dial: (212) 390-9559  
Nick.Lewin@KriegerLewin.com

November 13, 2024

By ECF

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

***Re: United States v. Sue Mi Terry, 24 Cr. 427 (LGS)***

Dear Judge Schofield:

We represent Dr. Sue Mi Terry in the above-captioned proceeding. We write pursuant to the Court's October 28, 2024 Order, Dkt. No. 22, that the parties jointly propose a briefing schedule for pretrial motions. Accordingly, the parties propose the following schedule:

- Government's deadline to produce classified discovery: November 15, 2024
- Defendant's motion for a bill of particulars: December 4, 2024
  - Government's opposition: December 26, 2024
  - Defendant's reply: January 3, 2024
- Defendant's motion to dismiss the Indictment: February 5, 2025
  - Government's opposition: February 26, 2025
  - Defendant's reply: March 5, 2025
- Defendant's motion(s) to suppress and any other Rule 12(b)(3) motion(s): March 12, 2025
  - Government's opposition: April 2, 2025
  - Defendant's reply: April 9, 2025
- Government's CIPA Section 4 submission: April 15, 2025

Additionally, the parties each respectfully request an ex-parte CIPA Section 2 conference at the Court's convenience.

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We are available should the Court require any additional information or have any further questions.

Respectfully submitted,

By: /s/  
Nicholas J. Lewin  
Melissa C. Danzo  
KRIEGER LEWIN LLP

Lee S. Wolosky  
JENNER & BLOCK LLP

Faith E. Gay  
Temidayo Aganga-Williams  
Joshua W. Bean  
SELENDY GAY PLLC

cc: All counsel of record (via ECF)